

September 14, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, NTInet Inc., provides fixed wireless broadband service in the rural areas of central South Carolina. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no or few broadband choices. We built our network using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in the Bowman, Cameron, Elloree, Eutawville, Holly Hill, Providence, Reevesville and Santee areas of South Carolina can now get broadband service. Our service is a mixture of business and residential customers. We rely heavily on the unlicensed 900 Mhz frequency to provide access to most of our customers due to heavy tree foliage.

NTInet Inc. is very interested in utilizing television white spaces so that we can expand and improve our service coverage areas in South Carolina. Our area is mainly covered with tall dense tree foliage and is difficult to cover due to the limited availability of towers, antenna structures and frequencies that can penetrate dense tree foliage. With the TV white space bands and with some modifications of the rules we will be able to cover a lot more area from our existing towers and antenna structures. Most of this newly covered area currently has no broadband access, and cannot be covered without these frequencies or the expense of constructing costly new towers. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying and not deploying in an area. Also, due to the height of the tree canopy in our areas, the 30 meter maximum base station height would severely limit our coverage area using these frequencies. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

NTInet is committed to providing quality broadband access to rural areas of South Carolina. We feel it is the most cost effective way to provide access to rural and sparsely populated areas. Allowing our company to use the white space spectrum would greatly increase our ability to provide broadband access to many under and unserved areas. We ask the FCC to approve the requested WISPA and Motorola proposed changes and allow rural Americans the access to affordable broadband they deserve and need during these tough economic times.

Sincerely,

Douglas Hair
President/CEO
NTInet Inc.